

Jeremy Johnson



Bob Holden, Governor • Stephen M. Mahfood, Director

REC'D

FEB 22 2001

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY **RCAP**

P.O. Box 176 Jefferson City, MO 65102-0176

February 16, 2001

CERTIFIED MAIL – Z 290 178 535
RETURN RECEIPT REQUESTED

Mr. Bryan Kury
Project Manager
The Boeing Company
Dept. 464C, Bldg. 220
Mail Code S221-1400
P.O. Box 516
St. Louis, MO 63166-0516

RE: Conditional Approval of the Revised Remedial Action Plan for the Former
Fabrication Operations Area; USA Department of the Navy/Boeing Tract I
Facility; Hazelwood, Missouri; Permit #: MOD00818963

Dear Mr. Kury:

The Missouri Department of Natural Resources' Hazardous Waste Program (HWP) has completed review of the revised Remedial Action Plan (RAP) dated February 7, 2001, for the former fabrication operations area. The revised RAP was submitted to address concerns raised by HWP project staff during a January 31, 2001, teleconference between Boeing and the HWP. Those concerns were based on the HWP's review of Boeing's original RAP dated January 19, 2001. The revised RAP is intended to facilitate implementation of corrective measures on a portion of the Tract I facility. The proposed corrective measures are based on the results of Boeing's Phase 2 Environmental Site Assessment and are intended to be implemented as a stabilization/interim measure pursuant to Corrective Action Condition IV C of the above-referenced permit. The department hereby approves the February 7, 2001, revised RAP with the following conditions.

CONDITIONS:

1. As indicated in previous correspondence to Boeing, the corrective measures proposed in the revised RAP, as a whole, are significant in that active remediation of




R00178427
RCRA RECORDS CENTER

substantial soil and groundwater contamination is contemplated and, if successful, these measures may constitute a final remedy for the area under consideration. As such, public notice and opportunity for comment must be provided for the proposed corrective measures in a fashion similar to that which would be provided for a proposed final remedy. As discussed and previously agreed to: 1) Boeing intends to publish a department-approved public notice of the proposed corrective measures on a minimum of four consecutive week ends in at least one newspaper of general circulation that is distributed in the vicinity of the Tract I facility; 2) the public notice shall provide an opportunity for comment of not less than 30 days from the first publication date; 3) following publication, Boeing intends to provide proof of publication to the department in the form of copies of the published notices and affidavits of publication from the newspaper; and 4) the complete corrective action administrative record supporting the proposed corrective measures shall be made available for review at both the HWP's office in Jefferson City, Missouri, and a public library in the vicinity of the Tract I facility during the public comment period.

The public notice and opportunity for comment on the proposed corrective measures contained in the revised RAP, the department's response to comments, if any, received during the public comment period and any resulting changes to the revised RAP must be complete prior to actual implementation of the RAP.

2. Figure 2-3 in the revised RAP must be further revised prior to inclusion of this figure in the information repositories described above. The Phase 2 investigation summary analytical results and corresponding ITLs for a representative cross-section of monitoring points (i.e., selected points across the former fabrication operation area) where both filtered and unfiltered metals analyses (arsenic, barium, cadmium, chromium, lead and mercury) were performed shall be included on Figure 2-3.
3. Additional investigation must be performed during implementation of the revised RAP to provide further certainty that the presence of metals in the groundwater across a large portion of the former fabrication operations area (with the exception of the plating area) is largely related to groundwater sample turbidity and does not represent mobile and/or dissolved-phase metals in the groundwater. The revised RAP must be further revised prior to inclusion in the information repositories described above to include sampling and analysis of monitoring wells 1, 2, 3, 4, 5, 6D, 7, 9S, 10S and B28MW2 for total and dissolved arsenic, barium, cadmium chromium, lead and mercury. Further, the RAP the RAP must specify comparison of the background metal concentrations from monitoring wells 1, 2, and 4 with those obtained from the downgradient wells in this area as a means to determine if the

Mr. Bryan Kury
February 16, 2001
Page 3

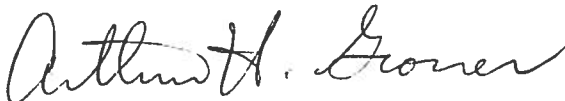
downgradient metals concentrations outside of the plating area are at levels of concern. The results obtained from the background wells may be averaged in performing these comparisons. In the event that the downgradient wells are determined to contain metals at levels of concern, further discussion with the HWP will be necessary to determine what, if any, additional action is necessary.

4. Boeing must include a copy of pertinent pages of the USGS-Based St. Louis County Background Soil Concentrations used in determining the Soil Preliminary Remediation in the revised RAP prior to its inclusion in the information repositories described above.
5. Though not a condition of this approval, the HWP would like to encourage Boeing to continue to explore and maximize the use low flow sampling techniques in order to minimize the turbidity (thereby maximizing the representative nature) of future groundwater samples. If representative total (unfiltered) metal concentrations can be obtained from Boeing's monitoring wells, this may obviate the need for dissolved (filtered) metals analyses in the future. The HWP also requests that Boeing provide timely notification of any future groundwater sampling that is to be performed to allow HWP staff to observe the sampling and/or split samples.

The HWP would like to commend Boeing for the proactive approach to corrective action investigation and remediation that has occurred to date with respect to the Tract I facility. Boeing appears committed to ensuring that appropriate measures are taken to protect human health and the environment. As you are aware, the department retains the right to require further corrective action within the context of the facility permit, if the need for such action should arise. The HWP looks forward to working with Boeing on the innovative approach to remediation in the former fabrication operations area. If you have any questions concerning this approval, the conditions contained herein or require any additional information, please do not hesitate to contact Mr. Patrick Quinn of my staff at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM



Arthur H. Groner
Chief, Permits Section

AHG:pqs

c: Mr. Jeremy Johnson, U.S. EPA Region VII
St. Louis Regional Office